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September 20, 2022

BY ECF

Hon. Ramon E. Reyes, Jr.
United States Magistrate Judge
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Hernandez v. Sub Enterprises, et al.; 21-cv-01874 (RER)

Your Honor:

We represent Plaintiff in the above referenced matter. We write to respectfully request the Court compel Joel Reich's compliance with post-judgment discovery obligations pursuant to Fed. R. Civ. P. 37(a).

On August 4, 2022, the Court ordered Mr. Reich to respond to Plaintiff's post-judgment information subpoena (the "Subpoena") by August 19, 2022. Mr. Reich responded, however, his answers contained deficiencies. A copy of Mr. Reich's response to the Subpoena is attached as "Exhibit A."

On August 29, 2022, I asked Mr. Reich to provide amended responses to several of the questions where Mr. Reich's answers were either evasive or incomplete. The following is a summation of Plaintiff's disputes with Mr. Reich's answers:

Question 9 asks Mr. Reich to "Please identify any PPP money Sub Enterprises, Inc. a/k/a Sub Enterprises was granted since January 1, 2020. Identify where the money was originally held and where it is currently held." In his answer, Mr. Reich identifies how much was received but not where the money was held and is currently held.

Question 11 asks Mr. Reich, "What is Sub Enterprises, Inc. a/k/a Sub Enterprises connection to The Barrier Group, Inc.? Has Sub Enterprises, Inc. a/k/a Sub Enterprises transferred any property to the Barrier Group, Inc. since January 1, 2020? Does the Barrier Group, Inc. utilize the same staff, equipment or telephone number that Sub Enterprises, Inc. a/k/a Sub Enterprises uses or used?" Mr. Reich barely answered this question. He neither explains what the connection between the two companies is nor whether they share the same property, staff, telephone number, etc.

Question 12 asks Mr. Reich to "Please identify all companies or businesses located at 435 Bellvale Rd, Chester, NY 10918. Identify the staff of each company, including all staff members' names, titles, addresses and telephone numbers. For each company identified, explain its connection to Sub Enterprises, Inc., i.e., does it share property with Sub Enterprises, did it receive property from Sub Enterprises in a transfer, etc." In his answer, Mr. Reich fails to identify: the names, titles, addresses and telephone numbers of the staff of these companies; (2)

the connection between the companies and Sub Enterprises; and (3) whether these companies share any property with Sub Enterprises.

The answers to these questions are particularly important as Plaintiff believes Mr. Reich engaged in a fraudulent conveyance, and is currently operating alter egos or successors of the judgment debtor. I have tried contacting Mr. Reich's counsel by email and telephone to no avail. As such, and since Mr. Reich won't voluntarily provide amended responses to the Subpoena, we respectfully request the Court compel his compliance.

Thank you for your attention.

Respectfully Submitted,

/s/Jesse Barton

Jesse Barton, Esq.
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Encl.

Cc: Joel Reich (**Via Email**)
c/o Levenson Law